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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

In re:  
  
JAMES M. PARK,  
  
Debtor.

Case 2:25-cv-00697-GMN  
Consolidated with case 2:25-cv-00716  
  
*Appeal from the Bankruptcy Court*  
Nevada Bankruptcy Case No. 24-11788-abl  
and Adversary Proceeding 24-01046-abl

INTERASIAN DIGITAL  
TECHNOLOGY HOLDINGS LTD.;  
  
Appellant.

v.

ROBERT E. ATKINSON, Trustee;  
  
Appellee.

**STIPULATION AND ORDER TO  
MODIFY PAGE LIMITS FOR THE  
PARTIES' APPEAL BRIEFS**

1 Appellant Interasian Digital Technology Holdings Ltd. and Appellee Robert E. Atkinson, in  
2 his capacity as a court-appointed trustee, submit this Stipulation and [PROPOSED] Order to Modify  
3 the Page Limits for the Parties' Appeal Briefs. This Stipulation is made pursuant to LR IA 6-2 and  
4 LR 7-3(c), and the parties agree as follows:

5 1. As set forth in previous stipulations, ECF Nos. 9, 10, this action is an appeal to this  
6 Court from an order entered in the bankruptcy case of nonparty/debtor James Park, Case No. 24-  
7 11788-ABL (the "Park Bankruptcy"), approving a settlement (the "Settlement Agreement") between  
8 Park, the trustee (Appellee here), and a third party to the Park Bankruptcy, Paxi Park.

9 2. Appellant Interasian was not a party to, nor did it consent to, the Settlement Agreement,  
10 and on January 22, 2025, Appellant objected to the Motion to Approve.

11 3. The Court nevertheless granted the Motion to Approve, and Interasian filed a Notice of  
12 Appeal, resulting in the initiation of this action (the "Appeal").

13 4. The Parties make this stipulation to seek additional pages to brief the Appeal.

14 5. Appellant Interasian identified the following questions on appeal in its April 30, 2025,  
15 Statement of Issues on Appeal:

- 16 a. Did the Bankruptcy Court's approval of the proposed settlement between  
17 the Trustee, the Debtor, and the Debtor's daughter violate  
18 Appellant/Creditor Interasian's due process rights and the reasoning by the  
19 United States Supreme Court in *Harrington v. Purdue Pharma, L.P.*, 603  
20 U.S. 204 (2024) ("*Purdue Pharma*"), which prohibits non-consensual third-  
21 party releases in analogous bankruptcy contexts, where (1) the daughter  
22 obtained a substantial benefit from the release of Appellant's state court  
23 claims against her, and (2) where the proposed settlement granted the  
24 daughter a valid interest in the Debtor's real property even though she: (i)  
25 was not scheduled as a creditor, (ii) failed to file a proof of claim asserting  
26 an interest in the property at issue, and (iii) contributed little, if any, of her  
27 own money to the settlement, while she (iv) obtained what amounts to a  
28

1 discharge from Interasian's claim and a six-figure property interest in the  
 2 Debtor's property, all despite the Debtor being denied a discharge?

- 3 b. Did the Bankruptcy Court's approval of the proposed settlement improperly  
 4 prevent Appellant/Creditor Interasian from pursuing its pre-petition state  
 5 court claims against the Debtor's daughter after denying Debtor a discharge  
 6 under Section 727(a)(2) and/or Section 727(a)(4)(A) of the Bankruptcy  
 7 Code, particularly when the Bankruptcy Court made the necessary factual  
 8 findings to deny the Debtor a discharge before the settlement was agreed to,  
 9 let alone approved?

10 **Ex. 1-A**, Statement of Issues on Appeal, on file with Bankruptcy Clerk, pp. 1-2.

11 6. Good cause to modify the presumptive page limits in LR 7-3(b) exists in this matter for  
 12 the following reasons:

- 13 a. This Appeal raises novel and important issues regarding the application of  
 14 the recent guidance in *Purdue Pharma*, made in the context of a Chapter 11  
 15 bankruptcy proceeding, to the facts of Park's underlying bankruptcy here,  
 16 which was filed as a Chapter 7 proceeding;
- 17 b. Such underlying facts are complex and involve conduct that dates back to a  
 18 judgment entered in New York in 2013, involve litigation by Appellant and  
 19 debtor in several jurisdictions, and as relevant to the appeal, involve  
 20 significant litigation and other activity during the several years preceding  
 21 Park's bankruptcy filing in 2024; and
- 22 c. The record on appeal is therefore lengthy; Appellant and Appellee have  
 23 together designated numerous ECF filings and transcripts from the Park  
 24 Bankruptcy, including exhibits, as part of the record on Appeal, *see Exs. 1-*  
 25 **B and 1-C**; while Appellant does not anticipate citations to the entire record  
 26 it designated for appeal, Appellant does expect to make significant record  
 27 citations, and the additional pages sought here will ensure Appellant can  
 28 provide a fulsome explanation of the relevance of such record citations to

1 the determinations this Court must make (and that Appellee has sufficient  
2 space to respond).

3 *See Ex. 1*, Ewing Decl., pp. 3-4.

4 7. The parties seek an additional 6 pages for Appellant's opening brief (30 pages total),  
5 an additional 6 pages for the Respondent's answering brief (30 pages total), and an additional 8 pages  
6 for any reply brief (20 pages total).<sup>1</sup>

7 8. The parties do not submit this stipulation for purposes of delay or other improper  
8 purposes and believe that any additional pages used by Appellant or Appellee will assist the Court in  
9 reaching its decision.

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26 <sup>1</sup> The page limits the parties request here are consistent with the page limits for motions for  
27 summary judgment under LR 7-3(a). *See generally* LR 7-3. The Local Rules do not appear to  
28 contemplate specific treatment of page limits for appeals from the Bankruptcy Court. *See id.* While  
the parties agree the presumptive limits in LR 7-3(b) must therefore apply, the Appeal presented here  
supports good cause to modify the deadlines to allow for longer briefs in the context of this particular  
appeal, to allow for fulsome discussion of the issues.

1 NOW, THEREFORE, the Parties stipulate, subject to the Court's approval, to continue the  
2 briefing deadlines described above to the following dates:

- 3 1. Appellant shall have up to and including 30 pages for its opening brief.
- 4 2. Appellee shall have up to and including 30 pages for his answering brief.
- 5 3. Appellant shall have up to and including 20 pages for any reply brief.

6 **IT IS SO STIPULATED.**

7 Dated this 2nd day of July, 2025

8 **GREENBERG TRAURIG, LLP**

9 /s/ Kyle Ewing

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13 *Attorneys for Appellant Interasian Digital  
Technology Holdings Ltd.*

Dated this 2<sup>nd</sup> day of July, 2025

**ATKINSON LAW ASSOCIATES LTD.**

/s/ Robert E. Atkinson

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*Attorney for Appellee Robert E. Atkinson,  
Trustee*

14  
15 **IT IS SO ORDERED.**

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17   
UNITED STATES DISTRICT COURT JUDGE

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19 Date: July 3, 2025